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Via ECF

February 5, 2018

Hon. Debra Freeman
U.S. Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Rock v. Enfants Riches Deprimes, LLC, et al., No. 17 Civ. 2618 (ALC) (DCF)

Dear Judge Freeman:

We represent Defendants Enfants Riches Deprimes, LLC and Barneys New York, Inc. (together, "Defendants") in the above-referenced action. We write pursuant to Your Honor's Individual Rule and Practice I.B., and Your Honor's instructions during the January 30, 2018 conference, to request an extension of the pending discovery deadlines, and to provide the Court with a detailed discovery plan.

The parties have exchanged document requests and interrogatories, and made their first document productions on Friday, February 2, 2018. Defendants' document production was not complete, however, because several of the responsive documents contain confidential and highly confidential information that Defendants have agreed to produce only once a protective order has been entered by the Court. The parties finalized the protective order on January 23, 2018, and submitted it to the Judgments Clerk for the Court's signature, but the protective order has not yet been entered by the Court.

Moreover, as was discussed during the January 30, 2018 conference with the Court, there is a chance that documents within Plaintiff's control (but not possession) may not be produced to Plaintiff, for production to Defendants, until after the fact discovery deadline, or until after the completion of depositions, and may necessitate additional and/or follow-up depositions.

Defendants therefore respectfully request that the Court modify the Scheduling Order as follows:

Event	Current Deadline	New Deadline
Depositions of fact witnesses	n/a	March 9, 2018
Requests to Admit	n/a	March 20, 2018



Close of all fact discovery	February 28, 2018	March 30, 2018
Expert disclosure for party bearing burden of proof on that claim or defense	March 30, 2018	April 30, 2018
Rebuttal expert reports	April 30, 2018	May 30, 2018
Close of expert discovery	May 15, 2017	June 22, 2018

This is the parties' first request for an extension of the pending discovery deadlines, and Plaintiff Mick Rock consents to this request.

Respectfully submitted,

/s/ Barry I. Slotnick

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Partner

Enclosure

cc: Richard Liebowitz, Esq. (via ECF)